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Attorney for Plaintiff  
Ningbo Bonny e-Home Company Ltd.

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

NINGBO BONNY E-HOME CO.,  
LTD.

Case No. 2:24-cv-00568

NOTICE OF APPLICATION

Plaintiff,

v.

ONDWAY, POOLCLEAN US  
STORE, USA WAREHOUSE,  
BOWANJIE, INPOOL US STORE,  
DEWFOND, DIGIGER,  
MOTOBUDDY STORE, and et al.  
Individual, Partnerships  
Defendants.

NOTICE OF APPLICATION FOR 1) TEMPORARY RESTRAINING  
ORDER; 2) ORDER RESTRAINING ASSETS AND STOREFRONTS; AND  
3) ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION  
SHOULD NOT ISSUE

1 Plaintiff now moves this Court for an Order granting their Application for: 1) a  
2 temporary restraining order; 2) an order restraining assets and Merchant  
3 Storefronts; 3) an order to show cause why a preliminary injunction should not  
4 issue. The legal support for this motion is contained in the accompanying  
5 Memorandum of Law. The evidence supporting this motion is contained in the  
6 Declarations of President Hong and Raymond Chan, and the exhibits attached  
7 thereto. A proposed order is filed herewith.  
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10 Respectfully submitted,

11 /s/Patricia Ray

12 Attorney for Plaintiff

13 RAYCHAN I.P. LAW FIRM, PLLC

14 Dated: April 25, 2025  
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